



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Aviation Safety

800 Independence Ave  
Washington, DC 20591

February 2, 2022

Exemption No. 19000  
Regulatory Docket No. FAA-2021-1134

Captain Jeff Hamlett  
Senior Director Regulatory Programs & Compliance  
Director of Operations  
Southwest Airlines Co.  
2195 Research Row, WGS-1DO  
Dallas, Texas 75235

Dear Captain Hamlett:

This letter is to inform you that the Federal Aviation Administration (FAA) has granted your request for an exemption. This letter transmits the FAA's decision, explains the FAA's basis, and provides the conditions and limitations of the exemption, including the date it ends.

### **The Basis for the FAA's Decision**

By letter dated December 1, 2021, you petitioned the FAA on behalf of Southwest Airlines Co. (Southwest) for an exemption from § 121.135(a)(3) of Title 14, Code of Federal Regulations (14 CFR) to the extent necessary to allow Southwest to use the date of the latest revision of each section or block of information of electronic manual content displayed in a continuous flow format, as the revision control, in lieu of a page control sheet commonly referred to as a list of effective pages.

The FAA has issued grants of exemption in circumstances similar in material respects to those presented in your petition. In Grant of Exemption Nos. 6612 and 18215 (copies enclosed), the FAA found that the grant of exemption was in the public interest and that the petitioner provided a level of safety equal to that provided by the rule from which an exemption was sought.

Having reviewed your reasons for requesting an exemption, I find that:

- They are similar in all material respects to relief previously requested in the enclosed Grant of Exemption Nos. 6612 and 18215;
- The reasons stated by the FAA for granting the enclosed Grant of Exemption Nos. 6612 and 18215 also apply to the situation presented in your petition; and

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- A grant of exemption is in the public interest.

### **The FAA's Decision**

The FAA has determined that good cause exists for not publishing a summary of the petition in the *Federal Register*. The FAA has determined that good cause exists because the requested exemption would not set a precedent and any delay in acting on this petition would be detrimental to Southwest.

Under the authority contained in 49 U.S.C. §§ 106(f), 40113, and 44701, which the FAA Administrator has delegated to me, I hereby grant Southwest Airlines Co. an exemption from 14 CFR § 121.135(a)(3) to the extent necessary to allow Southwest to use the date of the latest revision of each section or block of information of electronic manual content displayed in a continuous flow format, as the revision control, in lieu of a page control sheet commonly referred to as a list of effective pages, subject to the conditions and limitations described below.

### **Conditions and Limitations**

1. The page numbers may be omitted from any data output; however, the organizational format of the technical data must be retained.
2. The data output must employ appropriate references to the organizational format used (e.g., chapters, sections, paragraphs).
3. The data output system must include a means to allow a user to determine the revision status of the data output.
4. All printed data output must contain at least the following information:
  - a. The date the data output was printed;
  - b. The revision date of the data output; and
  - c. The title of the manual and the aircraft, component, or item to which the manual applies (e.g., Boeing 767, GE CF6-6, Sunstrand Constant Speed Drive).

Failure to comply with any of the above conditions and limitations may result in the immediate suspension or rescission of this exemption.

### **The Effect of the FAA's Decision**

This exemption terminates on March 31, 2024, unless sooner superseded or rescinded.

To request an extension or amendment to this exemption, please submit your request by using the Regulatory Docket No. FAA-2021-1134 (<http://www.regulations.gov>). In addition, you should submit your request for extension or amendment no later than 120 days prior to the expiration listed above, or the date you need the amendment, respectively.

Any extension or amendment request must meet the requirements of 14 CFR § 11.81.

Sincerely,

/s/

Robert C. Carty  
Acting Executive Director, Flight Standards Service

Enclosures

Exemption No. 6612

UNITED STATES OF AMERICA  
DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
WASHINGTON, DC 20591

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In the matter of the petition of

UNITED AIRLINES, INC.

for an exemption from  
Section 121.135(a)(3) of Title 14,  
Code of Federal Regulations

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Regulatory Docket No. 28545

GRANT OF EXEMPTION

By letter dated April 4, 1996, and supplemental information dated February 17, 1997, Mr. H. Takeuchi, Director, Engineering Services, United Airlines, Inc. (United), Maintenance Operations, San Francisco International Airport, San Francisco, California 94128, petitioned the Federal Aviation Administration (FAA) on behalf of United for an exemption from Section 121.135(a)(3) of Title 14, Code of Federal Regulations (14 CFR). The proposed exemption, if granted, would permit United to use electronic digital technology to present certain maintenance information and instructions to ground operations and management personnel without meeting the requirement to have the date of the last revision on each page of the information and instructions.

The petitioner requests relief from the following regulation:

Section 121.135(a)(3) prescribes that each manual required by Section 121.133 must have the date of last revision on each page concerned.

The petitioner supports its request with the following information:

The petitioner states that it has been using electronic digital technology to present certain maintenance information and instructions to ground operations and management personnel since March 24, 1995, in accordance with Exemption No. 6042. The petitioner now proposes to present this information in accordance with Air Transport Association (ATA) Specification 2100, "Digital Data Standards for Aircraft Support." This ATA specification

does not contain a provision for presenting the information in page format. The information would be contained in an electronic format without individual pages.

The petitioner states that the technical publications department maintains central control over information revisions in a manner equivalent to that formerly used for information produced on paper/microfilm, preventing others from altering the information and ensuring information control and accuracy. Only the most current information is available to the user, eliminating the need for dates on pages. According to the petitioner, the tracking of revisions will be in accordance with ATA Specification 2100 requirements; a revision date will be associated with each anchor level element, rather than with each page.

In support of its petition, United provides details regarding its central control procedures and an overview of its system for implementing the computer network that will be used for distribution of maintenance information. The petitioner notes that United's Technical Information Management processes have been in place for many years and contends that adding electronic media to these processes will enhance the airline's ability to distribute the contents of its data bases and improve accessibility of the most timely information.

According to the petitioner, revisions to documentation will be controlled in the same manner as current revisions; however, added electronic tools will be used. The petitioner states that most electronic revisions will be accomplished instantaneously over the computer network, but compact disc read-only memory (CD-ROM) technology will be used to support the Boeing Portable Maintenance Aid and the Airbus Computer Assisted Aircraft Trouble Shooting tools.

According to the petitioner, an equivalent level of safety will be met by reducing the opportunity for human error in overlooking or misfiling a revision and reducing the time lag associated with manually distributing revision pages.

The petitioner states that the petition is in the public interest because expediting the maintenance process will improve quality control while reducing downtime and costs. The petitioner contends that this will translate into economic benefits and improved service to the public.

The petitioner states that precedent exists for waiving publication of this exemption in the Federal Register. The petitioner believes that publication requirements would adversely impact its ability to provide training in a timely manner. Accordingly, the petitioner asks for waiver of the requirement to publish the petition in the Federal Register.

Although the petitioner requested that action on its request not be delayed for publication in the Federal Register, the FAA found that the petition, if granted, would set a precedent. Therefore, to permit the public to comment on the petition, a summary of this petition was published in the Federal Register on July 5, 1996 (61 FR 35296). One comment in favor of the petition was received from the Air Line Pilots Association (ALPA).

ALPA supports United's petition and recommends that the FAA grant the petitioner's request for an exemption. According to ALPA, the exemption, if granted, would have no adverse effect on safety. ALPA contends that because the use of electronic technology would eliminate human error, it would increase safety and provide system users more accurate and timely guidance.

The FAA's analysis/summary is as follows:

The FAA has reviewed the facts and data presented by United in support of its petition and has determined that a grant of exemption is appropriate and justified.

The FAA recognizes the advantages of electronic storage, retrieval, and distribution systems. In Amendment No. 121-251, "Commuter Operations and General Certification and Operations Requirements; Final Rule," which became effective on January 19, 1996, the Federal Aviation Regulations were amended to permit part 121 certificate holders to prepare, use, and retain the maintenance portion of their air carrier manuals in printed form, or in another form acceptable to the Administrator.

The FAA has determined that in comparison to paper- or microfilm-based information retrieval systems, the electronic retrieval of technical data from an electronic system offers improved data accessibility, quality control, and speed of distribution. These improvements result in enhanced safety and provide users with more rapid access to a wider range of technical data at a significantly reduced cost. Although Section 121.135(a)(3) requires that each manual required by Section 121.133 contain the date of the last revision on each page concerned, the FAA acknowledges that the traditional printed page may not always exist within an electronic system prepared and used by an air carrier. The FAA finds that there are other acceptable means to determine the revision status of the technical information in an air carrier's manual, and intends to clarify Section 121.135(a)(3) in a future rulemaking.

In consideration of the foregoing, I find that a grant of exemption is in the public interest. Therefore, pursuant to the authority contained in 49 U.S.C. Sections 40113 and 44701,

formerly Sections 313(a) and 601(c) of the Federal Aviation Act of 1958, as amended, delegated to me by the Administrator (14 CFR Section 11.53), United Airlines, Inc., is granted an exemption from 14 CFR Section 121.135(a)(3) to the extent necessary to allow United to use electronic digital technology, including CD-ROM technology, in lieu of printing the date of the last revision on each page of each manual as required by Section 121.133. This exemption is subject to the following conditions and limitations:

1. The page numbers may be omitted from any data output; however, the organizational format of the technical data must be retained.
2. The data output must employ appropriate references to the organizational format used (e.g., chapters, sections, paragraphs).
3. The data output system must include a means to allow a user to determine the revision status of the data output.
4. All printed data output must contain at least the following information:
  - a. The date the data output was printed.
  - b. The revision date of the data output.
  - c. The title of the manual and the aircraft, component, or item to which the manual applies (e.g., Boeing 767, GE CF6-6, Sunstrand Constant Speed Drive).

This exemption terminates on April 30, 1999, unless sooner superseded or rescinded.

/s/ Thomas E. Stuckey  
Acting Director, Flight Standards Service

Issued in Washington, DC, on April 28, 1997.



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Aviation Safety

800 Independence Ave  
Washington, DC 20591

May 3, 2019

Exemption No. 18215  
Regulatory Docket No. FAA-2019-0278

David Clark  
Manager, Flight Operations Regulatory Compliance & Certificate Management  
Alaska Airlines  
P.O. Box 68900  
Seattle, WA 98168

Dear Mr. Clark:

This letter is to inform you that we have granted your request for exemption. It transmits our decision, explains its basis, and gives you the conditions and limitations of the exemption, including the date it ends.

### **The Basis for Our Decision**

By letter dated April 5, 2019, you petitioned the Federal Aviation Administration (FAA) on behalf of Alaska Airlines, Inc. (Alaska Airlines) for an exemption from § 121.135(a)(3) of Title 14, Code of Federal Regulations (14 CFR) to the extent necessary to allow Alaska Airlines to use the date of the latest revision of each section or block of information of electronic manual content displayed in a continuous flow format, as the revision control, in lieu of a page control sheet commonly referred to as a list of effective pages.

The FAA has issued grants of exemption in circumstances similar in all material respects to those presented in your petition. In Grant of Exemption No. 10776 (copy enclosed), the FAA found that the grant of exemption was in the public interest and that the petitioner provided a level of safety equal to that provided by the rule from which an exemption was sought.

Having reviewed your reasons for requesting an exemption, I find that—

- They are similar in all material respects to relief previously requested in the enclosed Grant of Exemption No 10776;

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- The reasons stated by the FAA for granting the enclosed Grant of Exemption No. 10776 also apply to the situation you present; and
- A grant of exemption is in the public interest.

### **Our Decision**

The FAA has determined that good cause exists for not publishing a summary of the petition in the Federal Register because the requested exemption would not set a precedent, and any delay in acting on this petition would be detrimental to Alaska Airlines.

Under the authority contained in 49 U.S.C. § 106(f), 40113, and 44701, which the FAA Administrator has delegated to me, I hereby grant Alaska Airlines an exemption from 14 CFR § 121.135(a)(3) to the extent necessary to allow to use electronic digital technology to document the revision level in lieu of printing the last revision date on each page of each manual required under § 121.133, subject to the conditions and limitations described below.

### **Conditions and Limitations**

1. The page numbers may be omitted from any data output; however, the organizational format of the technical data must be retained.
2. The data output must employ appropriate references to the organizational format used (e.g., chapters, sections, paragraphs).
3. The data output system must include a means to allow a user to determine the revision status of the data output.
4. All printed data output must contain at least the following information:
  - a. The date the data output was printed;
  - b. The revision date of the data output; and
  - c. The title of the manual and the aircraft, component, or item to which the manual applies (e.g., Boeing 767, GE CF6-6, Sunstrand Constant Speed Drive).

This exemption terminates on May 31, 2021, unless sooner superseded or rescinded.

Sincerely,

/s/

Robert C. Carty

Deputy Executive Director, Flight Standards Service

